

ORIGINAL

FILED IN CHAMBERS
IN THE UNITED STATES DISTRICT COURT U.S.D.C. Atlanta

FOR THE NORTHERN DISTRICT OF GEORGIA APR 24 2013

GAINESVILLE DIVISION

JAMES N. HATTEN, Clerk

By: *Pfe* Deputy Clerk

UNITED STATES OF AMERICA :
: CRIMINAL INDICTMENT
v. :
: NO. 2:13-CR-15
LARRY McDANIEL, :
a/k/a "Larry Mack," :
HOWARD BROWN, and :
SEAN KING :
:

THE GRAND JURY CHARGES THAT:

COUNT ONE
(18 U.S.C. § 371)

1. Beginning in or about June 2012, and continuing until on or about August 16, 2012, in the Northern District of Georgia, the defendants, LARRY McDANIEL, a/k/a "Larry Mack," HOWARD BROWN, and SEAN KING, did knowingly and intentionally combine, conspire, confederate, agree, and have a tacit understanding with each other, to commit offenses against the United States, that is, (1) to violate Title 18, United States Code, Section 1512(c)(2), in that the defendants would corruptedly obstruct, influence, and impede an official proceeding, to wit: an investigation being conducted by the Federal Bureau of Investigation (FBI) in which D.B.S. was acting as an undercover informant for the FBI and Michael Griffin, a/k/a "Griff," a law enforcement officer, was acting in an undercover capacity, and (2) to violate Title 18, United States Code, Section 1512(c)(2), in that the defendants

would corruptedly obstruct, influence, and impede an official proceeding, to wit: a federal grand jury investigation into criminal offenses investigated by the FBI, said FBI investigation involving D.B.S. acting as an undercover informant and Michael Griffin, a/k/a "Griff," a law enforcement officer, acting in an undercover capacity.

2. In furtherance of the conspiracy, and to effect the objects and purposes thereof, one or more of the following overt acts were committed:

(a) In about June 2012, an unknown co-conspirator advised defendant LARRY McDANIEL that D.B.S., a member of the Cleveland Georgia Chapter of the Black Pistons Motorcycle Club was a "fed" or federal agent.

(b) On or about July 19, 2012, defendant McDaniel directed defendants BROWN and KING, and others not named as defendants herein, to travel to the Black Pistons Motorcycle Club clubhouse in Cleveland, Georgia.

(c) On or about July 19, 2012, defendant McDaniel directed defendants BROWN and KING, and others not named as defendants herein, to "shutdown" the clubhouse and collect all Black Pistons and Outlaw Motorcycle Club vests, known as "cuts," patches, belts, rings, t-shirts, and other paraphernalia identified with the Black Pistons and Outlaw Motorcycle Clubs from those present at the clubhouse.

(d) On or about July 19, 2012, defendants BROWN and KING, and others not named as defendants traveled to the Black Pistons Motorcycle Club clubhouse in Cleveland, Georgia.

(e) On or about July 19, 2012, defendants BROWN and KING, and others not named as defendants herein, closed the Black Pistons clubhouse and collected all Black Pistons and Outlaw Motorcycle Club vests, known as "cuts," patches, belts, rings, t-shirts, and other paraphernalia identified with the Black Pistons and Outlaw Motorcycle Clubs.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO
(18 U.S.C. § 1512(c)(2))

On or about July 19, 2012, in the Northern District of Georgia, the defendants, LARRY MCDANIEL, a/k/a "Larry Mack," HOWARD BROWN, and SEAN KING, aided and abetted by each other and others, did corruptedly obstruct, influence, and impede, and did attempt to corruptedly obstruct, influence, and impede, an official proceeding, to wit: an investigation being conducted by the Federal Bureau of Investigation (FBI) in which D.B.S. was acting as an undercover informant for the FBI and Michael Griffin, a/k/a "Griff," a law enforcement officer, was acting in an undercover capacity, in violation of Title 18, United States Code, Sections 1512(c)(2) and 2.

COUNT THREE
(18 U.S.C. § 1512(c)(2)

On or about July 19, 2012, in the Northern District of Georgia, the defendants, LARRY McDANIEL, a/k/a "Larry Mack," HOWARD BROWN, and SEAN KING, aided and abetted by each other and others, did corruptedly obstruct, influence, and impede, and did attempt to corruptedly obstruct, influence, and impede an official proceeding, to wit: a federal grand jury investigation into criminal offenses investigated by the FBI, said FBI investigation involving D.B.S. acting as an undercover informant and Michael Griffin, a/k/a "Griff," a law enforcement officer, acting in an undercover capacity, in violation of Title 18, United States Code, Sections 1512(c)(2) and 2.

A +1v2 BILL
Robert F. Brown
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